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9 IN THE UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
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13 Plaintiff,
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15 v.
16 STEVEN MICHAEL ROBERTS,
17 Defendant.

CASE NO. 2:20-CR-007 JAM

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: March 31, 2020
TIME: 9:15 a.m.
COURT: Hon. John A. Mendez

17 **STIPULATION**

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
19 through defendant's counsel of record, hereby stipulate as follows:

20 1. By previous order, this matter was set for status on March 31, 2020, and time was
21 excluded through that date.

22 2. By this stipulation, defendant now moves to continue the status conference until May 5,
23 2020 at 915 a.m., and to exclude time between March 31, 2020, and May 5, 2020, under Local Code T4.

24 3. The parties agree and stipulate, and request that the Court find the following:

25 a) On January 16, 2020, the government produced four disks of discovery to defense
26 counsel, which included documents, photos, and audio and video recordings.

27 b) Counsel for defendant desires additional time to review the discovery and discuss
28 it with her client. The defendant was released to a residential treatment program on March 2,

2020. Counsel for the defendant has informed the government that the current treatment program makes communication between counsel and the defendant difficult, so counsel requires additional time to allow her to discuss the case with her client.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of March 31, 2020 to May 5, 2020, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: March 16, 2020

McGREGOR W. SCOTT
United States Attorney

/s/ MIRIAM R. HINMAN
MIRIAM R. HINMAN
Assistant United States Attorney

Dated: March 17, 2020

/s/ CHRISTINA SINHA
CHRISTINA SINHA
Counsel for Defendant
Steven Michael Roberts

FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED this 17th day of March, 2020

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE